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10 *Attorneys for Creditors,*
11 *Majesti Mai Bagorio, et al.*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: PG&E CORPORATION, - and - PACIFIC GAS AND ELECTRIC COMPANY,	Bankruptcy Case No. 19-30088 (DM) Chapter 11 (Lead Case) (Jointly Administered)
Debtors.	JOINDER BY BAUM HEDLUND ARISTEI GOLDMAN CAMP FIRE VICTIMS CLIENTS IN CREDITOR THERESA ANN MCDONALD'S EMERGENCY PLEADING IN REPLY RE: NEED FOR ESTIMATION OF CLAIMS FROM JUDGE JAMES DONATO, U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA [Dkt. No. 7820].

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT, THE DEBTORS AND THEIR**
2 **ATTORNEYS OF RECORD, UNITED STATES TRUSTEE, AND OTHER**
3 **INTERESTED PARTIES:**

4 Claimants Majesti Mai Bagorio, Michelle Dawn Barker, Melissa Rae Barnard, and Sara
5 Joanne Bates, et al. (collectively, “Baum Hedlund Aristei Goldman Camp Fire Victims Clients”)
6 (listed fully in Appendix A), which include nearly 200 victims of the 2018 Camp Fire, hereby
7 join in Creditor Theresa Ann McDonald’s Emergency Pleading In Reply Re: Need For
8 Estimation Of Claims From Judge James Donato, U.S. District Court For The Northern District
9 Of California [Dkt. No. 7820].

10 In particular, the Baum Hedlund Aristei Goldman Camp Fire Victims Clients join the
11 Emergency Pleading’s objection as to (1) the court approving the \$13.5 billion estimate in a
12 vacuum, without access to how that estimate was calculated, and (2) allow the underlying
13 claimant damages data compiled by PG&E to remain confidential or not become part of the
14 public record. Confidentiality is contrary to the rights of public disclosure, and more specifically
15 the interests of the Camp Fire victims, as it involves the highest public interest: reshaping
16 public use of electricity in California and the Public Utilities Code and *fair compensation* of
17 victims of the fires criminally caused by PG&E.

18 The Baum Hedlund Aristei Goldman Camp Fire Victims Clients object to a
19 confidentiality clause that would hide the data sources of the \$13.5 billion settlement figure and
20 prevent the proper assessment of the fairness of the Trust Fund figure. “If PG&E is not required
21 to produce the records required by the U.S. District Court for the Northern District of California,
22 the public will never see the total amount of damages caused by those fires, and the public has a
23 right to know that information. It serves as a warning of what PG&E might do in the future. .
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1 .Putting the total damages figure on the public record has a potential impact of whether or not the
2 California legislature passes a law currently under consideration that provides for the takeover of
3 PG&E in the event its equipment causes another huge and deadly fire. [Emergency Pleading,
4 Dkt. 7820 at 5-6].
5

6 The Joint Statement asks the court to accept the \$13.5 billion figure at face value, in a
7 vacuum, without any analysis of how the figure was reached. Absent a calculation of total
8 damages involved, the court cannot properly determine whether \$13.5 billion plus the Assigned
9 Rights and Causes of Actions is an adequate amount to resolve the fire victims' claims. This
10 data must be provided to the court as fundamental information for its analysis, especially since
11 the Debtors and TCC stated the data was already compiled and analyzed by experts.
12

13 The total amount of damages caused by these fires must be calculated. It must be done to
14 (1) establish the amount for each claim that will be submitted to the Fire Victim Trustee for
15 payment, (2) allow the Trustee to calculate an allowed amount for each claim, and (3) allow the
16 Trustee to calculate any discount that will have to be applied to each allowed amount because of
17 the limited funds available.

18 The Joint Statement claims: "Because expert reports were due to be submitted in the
19 estimation proceedings one week after the settlement was reached, all of this data and analysis,
20 including the data on prior settlements, was well developed and available to the Parties during
21 their negotiation of the Aggregate Fire Victim Consideration."

22 The Emergency Pleading urged: "If the victims are required to do all the work necessary
23 to duplicate work PG&E states has already been done to come up with totals for their individual
24 claims, not only will they have to pay that expense and suffer an additional delay while the totals
25 are calculated, but also the results will be shielded by a confidentiality clause." [Dkt. 7820 at 5]
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CONCLUSION

For the foregoing reasons, the Baum Hedlund Aristei Goldman Camp Fire Victims Clients urge that (1) Debtors be required to produce to the court the calculations used for the \$13.5 billion estimate, and (2) file this data in the public record.

Dated: June 10, 2020

Respectfully submitted,

BAUM HEDLUND ARISTEI GOLDMAN

/S/ Ronald L.M. Goldman

By: _____
Ronald L.M. Goldman
Diane Marger Moore, *Pro Hac Vice*
Attorneys for Creditors,
Majesti Mai Bagorio, et al.

EXHIBIT A

Balsiger, Justine

Barker, Michelle

Barnard, Melissa, David Barnard, Tristan Barnard, Aiden Barnard & Hunter Barnard

Bates, Sarah

Bird, Douglas, Kathy Bird, Devon Bird

Bird, Devon, Alexis Liles, Ayden Evans

Bird, Douglas, Kathy Bird

Bird, Douglas, Kathy Bird (Rental)

Bustamante, Rudy, Bustamante, Diego

Cameron, Denise

Chambers, Tom

Christian, Kathy

Costa, Lynn

Culley, Denise, Emmett Culley

Darrin, Daniel

Dechter, Lorraine (2 homes)

Dechter Lorraine (Studio)

Deen, Janet

1	Delaney, Colleen, Struthers, John
2	Dobra, Susan, John Michael Sun
3	Ferreira Steve, Ghirardelli, Jill
4	
5	Flores, Lisa (2 houses)
6	Garcia, Jerry , Sharon Garcia
7	Gilbertson, Regan, Wayne Wise, Chad Wise
8	
9	Gottowski, Gary, Rebecca Gottowski (HOME)
10	Gottowski, Gary, Rebecca Gottowski
11	Griffin, Suzanne (Rental)
12	Griffin, Suzanne (Mobile)
13	
14	Haber, Tom, Jeanne Haber (Home)
15	Haber, Tom, Jeanne Haber
16	Jolley, Joan, Jane Ann Balsiger
17	
18	Jones, Norman
19	
20	Joseph, Daniel
21	
22	Kasza, Elizabeth
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24	Kasza, Elizabeth J.
25	
26	Koenig, David
27	
28	Kunst, John, Vicki Kunst
	Kunst, John, Vicki Kunst (Rental)
	Kunst, John, Vicki Kunst

1	Lawhun, Jolene, Mateo Lawhun, Alec Lawhun
2	Lawhun, Nicole, Steven Lawhun, Monica Mae Baggorio, Majesti Mai Bagorio, Yhana Mia Quinones-Gallegos, David Astrup (Minors -Margarita & Mauricia)
3	Linda Gunn, Lucille Lawhun
4	
5	Lazzarino, Mark, Stacy Lazzarino, (Minors - Trinity, Isabella and James Lazzarino)
6	
7	Lewis Kelly, Quigley, Michael (Home)
8	Lewis Kelly, Quigley, Michael (Rental)
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10	Luce, David, Jeri Ann Luce
11	
12	Luce, Edward
13	
14	Lundberg, David, Jerry Ann Lundberg
15	
16	Maria Madruga, Noah Madruga
17	
18	Magalia Community Church
19	
20	Matson, Kelly
21	
22	McKinnon, Mark, WendyMcKinnon
23	
24	Menezova, Maria, Tonetti, Elena
25	
26	Miller-George, Sandra, John Miller-George
27	
28	Morch, Andreas, Joanne Morch
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30	Moseley, Pamela
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32	Myers, Jean Marie, James Myers
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34	Paradise Community Guild (Phelps-Zink)
35	
36	Parker, Rosalie & Switzer Paul
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1 Petersen, Jennifer Ann, David Pendergast, Michael Petersen, Logan Pendergast, Porter
2 Petersen, Cheryl Pendergast, Wilbert Pendergast, Jr.

3 Phelps-Zink, David, LoriPhelps-Zink

4 Poe, William & Moraes, Maria (Lotus)

5 Quattlander, Karen, Walden, Michael

6 Renn, Carole Louise – (De Lis Mingo)

7 Rose, Jim

8 Schuttenberg, Mark, Tanya Shuttenberg

9 Smelser, Matthew, Alexander, Brandy

10 Stewart, Donald, Sara Stewart, Jessie Stewart (Minors Griffin & River)

11 Strange, Wendy

12 Thorn, Steven

13 Toci, William, Diana Toci

14 Turner, Meghan, Charles Turner (Minors- Wesley & Hudson)

15 Varlinsky, Ray, Love, Marianna

16 Ward, Nicholas –(Bainbridge, Robert, deceased)

17 Westrope, Anthony

18 Williams, Robert

19 Winterburn, Anthony, Alexandria Winterburn (Aria & Hayden)

20 Wonacott, Victoria

21 Yang, Zongmei

22 Bensel, Connie

1	Sprague, Andy & Janelle Sprague - (Home)
2	Sprague, Andy & Janelle Sprague - (Business)
3	Sprague, Andy & Janelle Sprague - (Business Property)
4	Sherman, Fay & Anne Sherman Home
5	Sherman, Fay & Anne Sherman Daughter lived there
6	Inoglia, Joseph & Arlene Inoglia Home
7	Inoglia, Joseph & Arlene Inoglia Rental
8	
9	
10	Swiger, Jennifer – Home
11	Swiger, Jennifer Paradise Mini Storage (personal & Business items)
12	Swiger, Jennifer - Rented Suite
13	Costa, Andrew & Shannon Costa Minor- Josephine Costa
14	
15	Boyd, Judith Thomas & Judith Boyd Family Living Trust
16	Vigo, Phillip, KarissaVigo (Adalina & Deklan) Minors
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18	Sweiger, John (Work Shop)
19	David Ellis
20	Don Zink
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PROOF OF SERVICE

I am over the age of 18 years and not a party to the within cause. My business address is Baum Hedlund Aristei Goldman, 10940 Wilshire Boulevard, 17th Floor, Los Angeles, California 90024. On this day, June 10, 2020, I served the following document(s) in the manner described below:

**JOINDER BY BAUM HEDLUND ARISTEI GOLDMAN CAMP FIRE VICTIMS
CLIENTS IN CREDITOR THERESA ANN MCDONALD'S EMERGENCY PLEADING IN
REPLY RE: NEED FOR ESTIMATION OF CLAIMS FROM JUDGE JAMES DONATO,
U.S. DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA [Dkt. No.
7820]**

X **VIA ECF:** I caused the aforementioned documents to be filed via the Electronic Case Filing (ECF) system in the United States Bankruptcy Court for the Northern District of California, on all parties registered for e-filing in Case Number Case No. 19-30088 (DM). Counsel of record are required by the Court to be registered e-filers, and as such are automatically e-served with a copy of the documents upon confirmation of e-filing.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct. Executed on June 10, 2020.

Diane Marger Moore
DIANE MARGER MOORE